## Exhibit A

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

The Financial Oversight and Management Board for Puerto Rico,

as representative of

The Puerto Rico Electric Power Authority, et al.

Debtor.

PROMESA Title III

No. 17 BK 04780-LTS

## [PROPOSED] ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY

Upon the motion dated July 17, 2017 (the "Motion")<sup>1</sup> of the Movants, pursuant to section 362(d) of the Bankruptcy Code, made applicable to this proceeding by section 301(a) of the Puerto Rico Oversight, Management, and Economic Stability Act of 2016 ("PROMESA"), 48 U.S.C. § 2161(a); and the Court having jurisdiction over this matter under 28 U.S.C. § 1331, and under section 306(a)-(b) of PROMESA, 48 U.S.C. § 2166(a)-(b); and venue being proper under section 307(a) of PROMESA, 48 U.S.C. § 2167(a); and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and the Court having reviewed the Motion and opposition thereto and having heard the statements of counsel at the hearing held before the Court (the "Hearing"); and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefore, it is hereby

**ORDERED** that the Motion is granted; and it is further

<sup>&</sup>lt;sup>1</sup> Capitalized terms not defined in this Order shall have the meanings ascribed to them in the Motion.

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**ORDERED** that the automatic stay arising under Bankruptcy Code § 362 is

vacated to permit the Movants to file a complaint substantially in the form attached as Exhibit B

to the Motion, as well as any other associated pleadings (the "Receiver Complaint"), to be fully

briefed, argued and decided by a court of competent jurisdiction, and (ii) if the Receiver

Complaint is resolved in the Movants' favor, to allow the court of competent jurisdiction to

appoint a receiver, and (iii) if a receiver is appointed, to allow the receiver to exercise its powers

under the supervision of the court of competent jurisdiction; and it is further

**ORDERED** that this Order is without prejudice to the Movants' right to seek

other or further relief from the automatic stay in appropriate circumstances; and it is further

**ORDERED** that notice of the Motion as provided therein shall be deemed good

and sufficient notice of the relief granted herein; and it is further

**ORDERED** that the Court shall retain jurisdiction to hear and determine all

matters arising from or related to the implementation, enforcement, or interpretation of this

Order.

Dated:

July \_\_\_, 2017

Honorable Laura Taylor Swain United States District Judge

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